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L-XE-10-006
10 CFR 50.54(a)(4)

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 2055-0001

Monticello Nuclear Generating Plant
Docket 50-263
License No. DPR-22

Prairie Island Nuclear Generating Plants Units 1 and 2
Dockets 50-282 and 50-306
License Nos. DPR-42 and DPR-60

Request for Approval of a Change to the Northern States Power Company –
Minnesota Quality Assurance Topical Report, NSPM-1

In accordance with 10 CFR 50.54(a)(4), Northern States Power Company, a Minnesota corporation (NSPM), requests U. S. Nuclear Regulatory Commission (NRC) review and approval of the following proposed change to the NSPM Quality Assurance Topical Report (QATR), NSPM-1, Revision 2.

Revise the portion of section A.7.3 (on page 18 of the QATR) that currently reads:

- “Regulatory Guide 1.143, Revision 2, November 2001, “Design Guidance for Radioactive Waste Management Systems, Structures and Components Installed in Light-water-Cooled Nuclear Power Plants” (Position C.7) – NSPM commits to the quality assurance guidance cited in Position C.7. Compliance with the remainder of the [technical] positions of Regulatory Guide 1.143 is site specific, as addressed in each plant UFSAR.”

To read instead:

- “Regulatory Guide 1.143, Revision 2, November 2001, “Design Guidance for Radioactive Waste Management Systems, Structures and Components Installed in Light-water- Cooled Nuclear Power Plants”– Compliance to the quality assurance guidance cited in Regulatory Guide 1.143, Revision 2, November 2001 is site specific, as addressed in each plant USAR.”

Reason for Change

Detailed QATR implementation reviews have identified that the commitment to Regulatory Guide 1.143 in the QATR is overly broad. The QATR applies to both the Monticello Nuclear Generating Plant (MNGP) and the Prairie Island Nuclear Generating Plant (PINGP). There are commitments to Regulatory Guide 1.143 in the Monticello Nuclear Generating Plant Updated Safety Analysis Report (USAR); however, there are none in the Prairie Island Nuclear Generating Plant USAR. This proposed change will remove the broad commitment from the QATR and utilize a reference to each site's USAR as the basis for commitment to Regulatory Guide 1.143.

Basis for Continuing to Meet Appendix B and Previously Accepted Commitments

The current licensing basis establishes appropriate quality assurance requirements for structures, systems and components that are included within the scope of the guidance of Regulatory Guide 1.143, Revision 2, November 2001. Specific commitments to Regulatory Guide 1.143, Revision 2, November 2001 are in accordance with each site's USAR. NSPM concludes that the QA program presented in the QATR, as revised herein, will continue to satisfy 10 CFR 50, Appendix B criteria.

Summary of Commitments

This letter makes no new commitments. It revises an existing commitment.



Gabor Salamon
Director, Nuclear Licensing and Emergency Preparedness
Northern States Power Company – Minnesota

Enclosure

cc: Administrator, Region III, USNRC
Project Manager, Monticello, USNRC
Project Manager, Prairie Island, USNRC
Resident Inspector, Monticello, USNRC
Resident Inspector, Prairie Island, USNRC

ENCLOSURE 2

REVISED PAGE 18 FOR SECTION A.7.3 OF THE NSPM QATR

1 page follows

NSPM
Quality Assurance Topical Report

- Regulatory Guide 1.143, Revision 2, November 2001, "Design Guidance for Radioactive Waste Management Systems, Structures and Components Installed in Light-water-Cooled Nuclear Power Plants" – Compliance to the quality assurance guidance cited in Regulatory Guide 1.143, Revision 2, November 2001 is site specific, as addressed in each plant USAR.
- Regulatory Guide 1.152, Revision 1, January 1996, "Criteria for Digital Computers in Safety Systems of Nuclear Power Plants" - None of the current NSPM plants were committed to this Regulatory Guidance during original construction. Regulatory Guide 1.152 may be used for plant modifications on a case by case basis, but this QATR makes no generic commitment thereto.
- Regulatory Guide 1.155, Revision 0, August 1988, "Station Blackout" (Position C.3.5) - NSPM commits to the quality assurance guidance cited in Position C.3.5, Appendix A. Compliance with Appendix B and the remainder of the [technical] positions of Regulatory Guide 1.155 is site specific, as addressed in each plant UFSAR or License commitments.
- Generic Letter 89-02/EPRI-NP-5652 (March 1988, and supplements through March 1993) – NSPM commits to compliance with the endorsed industry guidance regarding selection and qualification of commercial grade suppliers and dedication of commercial grade items for use in safety related applications.
- Branch Technical Position CMEB 9.5-1, Revision 2, July 1981 (Positions C.2 and C.4) – NSPM provisions for administrative controls for Fire Protection comply with site specific commitments, or with the provisions of Position C.2 of CMEB 9.5-1, Rev. 2, as specified in NRC approved site fire protection programs and the applicable NRC Safety Evaluation Reports. Application of the provisions of this QATR to fire protection activities provides elements of quality assurance that comply with site specific fire protection quality assurance commitments or with CMEB 9.5-1, Revision 2, Position C.4.
- Regulatory Guide 4.15, Revision 1, February 1979, "Quality Assurance for Radiological Monitoring Programs (Normal Operations) – Effluent Streams and the Environment" – NSPM commits to compliance with Regulatory Guide 4.15.
- Regulatory Guide 7.10, Revision 1, June 1986, "Establishing Quality Assurance Programs for Packaging Used in the Transport of Radioactive Material" – NSPM commits to implement the quality assurance guidance for activities related to the packaging and transport of radioactive material that are under its control. Quality Assurance for the design, fabrication and licensing of shipping containers is the responsibility of the container certificate holders.
- Generic Letter 85-06, April 1985, "Quality Assurance Guidance for ATWS Equipment That Is Not Safety-Related" - NSPM commits to the quality assurance guidance cited in the Generic Letter.
- Regulatory Issue Summary 2000-18, October 2000, "Guidance on Managing Quality Assurance Records in Electronic Media" – Should NSPM choose electronic media storage as a means of maintaining required records, NSPM will comply with the guidance of this Regulatory Issue Summary.